

**ELLEN O'CONNELL**  
ATTORNEY AT LAW

LAW OFFICE OF ELLEN O'CONNELL, LLC  
P.O. BOX 132  
30 COLUMBIA TURNPIKE  
FLORHAM PARK, NJ 07932-0132  
P (973) 295-6800  
F (973) 295-6799

[ECC@ELLENCONNELLESQ.COM](mailto:ECC@ELLENCONNELLESQ.COM)

March 12, 2012

Hon. Michael A. Shipp  
United States District Court  
Martin Luther King Jr. Federal Bldg.  
Newark, NJ 07101

Re: White v. Smiths Detection, Inc.  
Docket No. 2:10-cv-04078-SRC/MAS

Dear Judge Shipp:

This firm represents the Plaintiff, Sally White. A settlement conference is scheduled before Your Honor on March 30, 2012. The Discovery End Date ("DED") is May 7, 2012. I am writing for leave to take depositions in the next three weeks over the Defendants objection.

Before the court set the May 7, 2012 DED, the parties planned to take the Plaintiff's deposition (the deposition has since occurred) but delay the defendants' depositions until after the settlement conference. However, since then, the court set DED as May 7, 2012, seven weeks away. The agreement now works an injustice to the Plaintiff. Conducting no discovery during three of the seven remaining weeks places the Plaintiff at the critical disadvantage of having to rush all depositions and discovery in four weeks.

I request that, instead of doing nothing for the next three week, I be able to use this time to conduct merely two depositions, those of (1) Smiths Detections HR VP Robin Falcone whose office is in Morris County, NJ, and (2) a third-party witness from Mercer Company, which prepared a report used by Ms. Bouchard during the Sally White Deposition. The Plaintiff is entitled to this discovery and it is essential to level the field going into the settlement conference. There is no reason under the Rules to delay, but every reason to permit them to go forward. I respectfully request that the court indicate that two depositions may proceed during the next three weeks.

Respectfully Submitted,  
LAW OFFICE OF ELLEN O'CONNELL, L.L.C.

s/Ellen O'Connell  
By: \_\_\_\_\_  
Ellen O'Connell

cc: Sarah Bouchard, Esq.  
Jyotin Hamid, Esq.